

March 23, 1988



FILE COPY

Illinois Environmental
Protection Agency
DLPC #24. Permit Section
2200 Churchill Road
POB 19276
Springfield, IL 62794-9276

Re: ILD 980502314

Dear Sirs:

Enclosed please find four (4) copies of a closure documentation report for the Velsicol Chemical (Sandoz Corporation) RCRA drum storage facility located at 330 E. Grand Avenue in Chicago. This facility has been closed in accordance with an IEPA approved closure plan.

The Agency's closure plan approval letter of 10/30/87 requested, in addition to the closure documentation report, that we "request withdrawal of (this) facility's Part A application" and "request .. release of financial assurance documents". Please consider this letter to be said requests. Please note that Velsicol still operates another RCRA facility elsewhere in Illinois (ILD 99072970). Therefore, the request regarding financial assurance documents does not extend to that facility.

Sincerely.

Robert S. Thiel !

Manager

Environmental Compliance

Robert S. Thick

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RST/dga

Enclosure

CLOSURE DOCUMENTATION REPORT CONTAINER WASTE STORAGE FACILITY RESEARCH LABORATORY 330 E. Grand Avenue Chicago, IL 60611





Prepared By

TEAM, Inc. February 29, 1988

CLOSURE DOCUMENTATION REPORT CONTAINER WASTE STORAGE FACILITY RESEARCH LABORATORY 330 E. Grand Avenue Chicago, IL 60611

INTRODUCTION

The following sections document and certify the closure of the Container Waste Storage Facility, located at 330 E. Grand Avenue, Chicago, Illinois, and operated by Sandoz Crop Protection (Sandoz). This storage area is a small, one-room building, attached to a complex of office and laboratory research buildings. The building structure consists of a concrete floor with no floor drains, concrete and steel roof, and walls constructed of a double row of brick. The floor space of this RCRA unit is approximately 30 feet by 32 feet.

The process code for the storage area is S01-2,750 gallons. Prior to January 26, 1988, Sandoz consolidated remaining removable fixtures, pallets, etc. into seven 55-gallon drums. A copy of the analysis for these drums and the waste manifest are presented in Appendix 1. The closure activities described below were performed in accordance with the Illinois Environmental Protection Agency (IEPA) approved closure plan and approval letter dated October 30, 1987.

TIME-LINE OF CLOSURE ACTIVITIES

Closure activities, dates of performance, and costs incurred are presented below.

Activity Consolidation of	Date(s)	Cost		
materials	1/18 - 1/25/88	\$ 1,200		
Inspection of unit	1/26/88 & 1/29/88	\$ 500		
Cleaning of unit	1/29/88	\$ 1,800		
Analysis of consolidated materials	1/27/88	See Next Entry		
Analysis of washwater	2/18/88	\$ 482		
Disposal of consolidated materials (Shipped)	2/26/88	\$ 1,830		
Disposal of washwater (Shipped)	2/26/88	\$ 925		
Engineering Services	1/26/88 - 2/29/88	\$ 1,000		

DESCRIPTION OF CLOSURE ACTIVITIES

Inspection of Unit

On January 26, 1988, an independent registered engineer from Total Environmental Assessment and Management, Inc. (TEAM) inspected the unit to determine if the "concrete containment structures for the container storage areas ... are free of cracks, gaps and joint separations, and are sufficiently impervious to have contained any leaks or spills and will be impervious to decontamination rinses during closure."

Several hairline cracks were observed upon inspection. However, based on the type of wastes which were stored (predominantly solids in drums), no reported leaks or spills, no evidence of staining, and the method of decontamination, TEAM felt that these cracks did not warrant coring through the concrete floor to obtain soil samples. TEAM contacted Karen Nachtwey, IEPA, this same day to discuss it's findings and recommendations. TEAM indicated to Ms. Nachtwey that if the analysis from the rinse water had significant concentrations of hazardous constituents, soil samples would be taken. If the rinse water was shown to be clean, no further action would be taken. Ms. Nachtwey concurred with this discussion.

Cleaning of Unit

On January 29, 1988, TEAM met with Chemical Waste Management, Inc./ENRAC at Sandoz. Upon inspection of the RCRA unit to be closed, seven drums were found in the drum storage room. These drums were removed from the unit and placed into the adjacent main building.

At approximately 7:45 A.M., ENRAC began to set up for the high pressure water washing. Decontamination of the drum storage room began at 8:20 A.M. The person washing the wall was wearing Level B protection (full-face mask with air line, hardhat, neoprene gloves, tyvek suit , rubber boot covers), while the person vacuuming the floor wore level C protection (air purifying mask, hardhat, neoprene gloves, tyvek suit, rubber boot covers). Spraying of walls was done on a ladder for the first spraying at the higher portions. The floors and walls were sprayed with the high pressure hose three times, with washing and vacuuming occurring simultaneously. There was no stoppage between each washing. After the third spraying of the drum storage room, the drum storage room was thoroughly vacuumed. Spraying was completed at approximately 9:00 A.M. Vacuuming was completed by 9:15 A.M.

At approximately 9:20 A.M., a water sample was taken from the waste water drum, which was approximately two-thirds full. The water sample was taken using a plastic rod and placed into a glass jar for analysis. A copy of this analysis is found in Appendix 2. Also found in this Appendix is the manifest for the washwater. The drum containing the waste water was properly marked and sealed and removed from the decontaminated room. The drum was placed with the seven other drums in the main structure.

Photographic documentation of the cleaning of this unit is presented in Appendix 3.

ANALYTICAL RESULTS

The results of the analysis for the rinse water was presented in Appendix 2. The approved closure plan did not require any analysis for clean closure. Since all of the collected water and residue is considered hazardous, the only analysis required was for a disposal decision. Chemical Waste Management, Inc., Technical Center conducted the analysis for disposal decision-making. These analyses utilized ASTM Standard Methods for Water and Wastewater, 16th Edition, SW-846, Second Edition, and EPA 600.

CERTIFICATION OF CLOSURE

The Closure Certification Statement is presented in Appendix 4.

APPENDIX 1

Analysis and Manifest for Consolidated Materials



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SPECIAL WASTE ANALYSIS REPORT



This Report is intended for the sole use and benefit of Waste Management and its companies. No representation concerning significance of the recorded data is made to any other person or entity.

<u> </u>	WASTE PROFILE SHEET COD
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	FROM SAMPLE CONTAINER

ADDRESS: F						eles Laboratory		05/A50-	-9701
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HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

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	Alabama High way 17 at Mile Marker 163 Emeile, Alabama 35459	<u> </u>
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total	Init I. I/Vol Waste No.
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	proper snipping name and are classified, packed, marked, and labeled, and are in all respects in proper upnoition for transport by highway appoint to applicable international and national government regulations.	
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	the best waste management method that is available to me and that I can arrord Printed/Typed Name Signature	Month Day Yea
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APPENDIX 2

Analysis and Manifest for Rinse Water

SPECIAL WASTE ANALYSIS REPORT

This Report is intended for the sole use and benefit of Waste Management and its companies no representation concerning significance of the reported data is made to any diner person of entity



WASTE PROFILE SMEET CODE

FROM SAMPLE CONTAINER

LABORATORY NAME	Gilei	micai Waste Manageme	nt 99000734 FEDE			
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WASTE SAMPLE SOLVENT SCREEN REPORT (GC/FID) -Weight % Solvents-

88000794 PROF: LABHE4196 02/01/88:

TECH SERVICES/SANDOZ ALSIF, IL/D. SMANIOTTO SRCE: LAB SITE: ALA

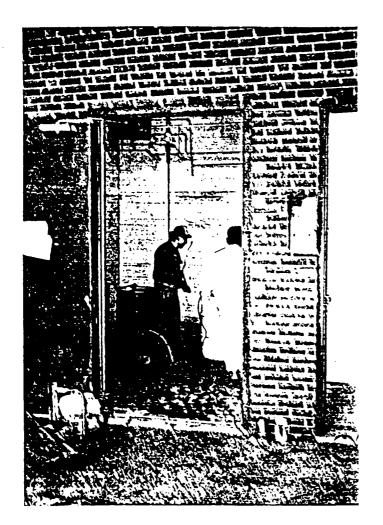
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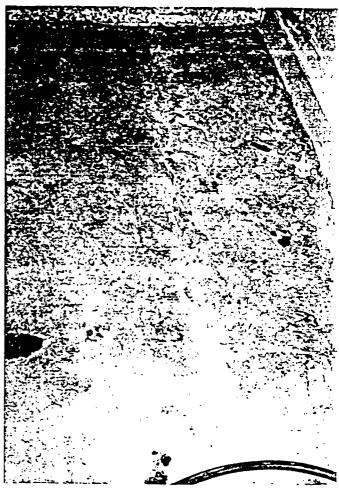
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	Ethyl Ether	Tetrachloroethylene
	Methanol	Butyl Acetate
	1,1,2-Trichloro-1,2,2- trifluoroethane	Ethylbenzene
		Xylenes
	Ethanol	Styrene
	Acetone	2-Ethoxyethanol Acetate
	Methylene Chloride	2-Butoxyethanol
,	<pre>Isopropanol</pre>	Cyclohexanone
	Carbon Tetrachloride	Chlorobenzene
	Ethyl Acetate	o-Dichlorobenzene
. •	Methyl Ethyl Ketone	Hydrocarbons
	1,1,1-Trichloroethane	High-Boiling organics
	Chloroform	(B.P. 290°C.)
	Benzene	Other Solvents:
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	Isobutanol	
	N-Butanol	
	Toluene	· · · · · · · · · · · · · · · · · · ·
	2-Ethoxyethanol	
(U = Compounds on list were and limit for each compound is	alyzed but not detected. Average detection s 0.01% by weight (100 ppm).
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2	Chicago, Illinois 60511 Generator's Phone (312) 670-4500	- .	•		AC3105	3 1 6	ត្រូត ពេញ
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<u>ا</u>	Chemical Maste Hanagement-Alsio [1] Designated Facility Name and Site Address 10.	US EPA ID Numbe		F.Bl.z		10 Tra	insporter's F
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	according to applicable international and national government regulations.					•	•
	If I am a large quantity generator, I certify that I have a program in place to economically practicable and that I have selected the practicable method of						
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APPENDIX 3

Photographic Documentation





Waste Storage Facility





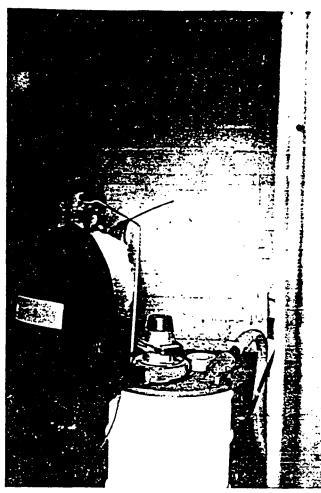
Consolidated Materials





Decontamination





Decontamination

APPENDIX 4 Closure Certification Statement

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management container storage area at the facility described in this document has been closed in accordance with the specifications in the <u>approved</u> closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

<u> 1LD980502314</u>
USEPA ID Number
KENNETH CREENBRUM >
Signature of Owner/Operator
Pateil Ris
Signature of Registered P.E
,

Facility Name

Velsicol Chemical (Sandoz)

NWI LAND MANAGEMENT CORPORATION
Name and Title VICE PRESIDENT

Patrick Ries, P.E./#6176952 Name of Registered P.E. and Registration Number

3/2/58

Date

Bright Little Care